

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

**IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION**

MDL NO. 2327

**THIS DOCUMENT RELATES TO THE CASE
ON THE EXHIBIT ATTACHED HERETO**

JOINT MOTION TO DISMISS DEFENDANT COLOPLAST CORP. WITH PREJUDICE

Plaintiffs whose case is listed on the attached Exhibit A and defendant Coloplast Corp.¹ (“Coloplast”) advise the Court that they have compromised and settled all claims between them in this action, including all counterclaims, cross-claims, and third-party claims. Accordingly, they jointly move the court to dismiss Coloplast as a defendant in this action with prejudice, and terminate Coloplast from the docket in this action, parties to bear their own costs. Other defendants remain in this action, and plaintiffs will continue to prosecute this action against them.

¹ Coloplast Corp. includes any incorrect or incomplete spellings of this Defendant, including Coloplast, Coloplast A/S, Coloplast Corporation, Coloplast Group, Coloplast Incorporated, Coloplast Manufacturing U.S., L.L.C., Coloplast Manufacturing U.S., LLC, Coloplast Manufacturing US, LLC, Coloplast Manufacturing, LLC, Coloplast Manufacturing, US LLC, Coloplast Manufacturing, US, L.L.C., Coloplast Manufacturing, US, LLC, and Coloplast, Inc.

Respectfully:

/s/ Lana K. Varney

Lana K. Varney
NORTON ROSE FULBRIGHT US LLP
98 San Jacinto Boulevard
Suite 1100
Austin, Texas 78701-4255
512.536.4594 (phone)
512.536.4598 (fax)
lana.varney@nortonrosefulbright.com
Attorney for Defendant Coloplast Corp.

/s/ Leslie C. MacLean

Leslie C. MacLean
WATERS & KRAUS
3219 McKinney Avenue
Dallas, TX 75204
214.357.6244 (phone)
214.357.7252 (fax)
lmaclean@waterskraus.com
Attorney for Plaintiffs on Exhibit A

Dated: October 28, 2016

EXHIBIT A – WATERS & KRAUS

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-cv-19589	Nell Owens, et al. v. Ethicon, Inc., et al.

CERTIFICATE OF SERVICE

I hereby certify that on October 28, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this member case.

/s/ *Lana K. Varney*
Lana K. Varney